

to said first and second interfaces an associated identifier that identifies a connection between a first device and a second device. The Examiner asserts that Nair teaches all of the limitations recited in claim 32 but the single high-speed device, which the Examiner asserts is taught by Freeman.

As to Nair, the Examiner does not provide specific correlation between the cited portions of Nair and the limitations recited in claim 32. More specifically, it is unclear to Applicants: [1] what portion(s) of Nair the Examiner asserts teaches a first port that connects to a first interface; [2] what portion(s) of Nair the Examiner asserts teaches a second port that connects to a second interface; [3] what portion(s) of Nair the Examiner asserts teaches a trunking pseudo driver coupled to the first port and the second port; and [4] what portion(s) of Nair the Examiner asserts teaches that the trunking pseudo driver allows the first interface and second interface to emulate a single high-speed device by assigning to said first and second interfaces an associated identifier that identifies a connection between a first device and a second device. Applicants hereby request that the Examiner provide citations to specific portions of Nair which recite each of the limitations recited in claim 32.

In an effort to move prosecution of this matter forward, Applicants hereby respond to the Examiner's assertion that most of the limitations of claim 32 as a whole are taught by cited portions of Nair. With regard to the Examiner's citation of col. 9, lines 15-37 of Nair, this portion recites multiple PCs sharing a LAN modem node as a gateway to a LAN, and some of the software that runs on the LAN modem node. It is unclear to Applicants how this teaching is pertinent to the limitations recited in claim 32. With regard to the Examiner's citation of col. 19, lines 35-50 of Nair, this portion teaches two LAN modem nodes that communicate over two channels. It is unclear to Applicants how this teaching is pertinent to the limitations recited in claim 32. With regard to the Examiner's citation of col. 21, lines 5-42 of Nair, this portion discusses the configuration of LAN modem node channels and re-establishing interrupted communications using the configurations. It is unclear to Applicants how this teaching is pertinent to the limitations recited in claim 32. With regard to the Examiner's citation of col. 22, lines 27-46 of Nair, this portion teaches that a Learn Table is used as a filter for bridge traffic. It is unclear to Applicants how this teaching is pertinent to the limitations recited in claim 32. With regard to the Examiner's citation of Fig. 2 of Nair, this drawing shows a main controller coupled to each of an internal modem, an external modem and a network interface in which the modems are each coupled to a phone line and the network interface is coupled to a LAN. It is unclear to Applicants how this teaching is pertinent to the limitations recited in claim 32. Applicants hereby reiterate their request that the Examiner provide citations to specific portions of Nair which recite each of the limitations recited in claim 32.

As to Freeman, the Examiner asserts that Freeman teaches a single high-speed device. Applicants concur that Freeman does briefly mention ISDN at col. 6, line 40; however, as to the other assertions made by the Examiner, Applicants are not in agreement. Moreover, the Examiner's other arguments regarding Freeman are unclear. Applicants are not sure why the Examiner has directed Applicants to the portion of Freeman which the Examiner asserts recites a "pseudo code program." (Freeman, col. 6, lines 20-50) This portion of Freeman describes some of the functioning of a dynamic testing procedure which tests the functionality of a subscriber designed call processing program. At col. 6, lines 45-50 Freeman states that pseudo code programming instructions showing an example subscriber designed call processing program is provided in Table 1 of Freeman. It is unclear to Applicants why the Examiner is citing this portion of Freeman. Applicants assert that this portion of Freeman fails to teach or suggest a trunking pseudo driver that allows the first interface and the second interface to emulate a single high-speed device by assigning to said first and second interfaces an associated identifier that identifies a connection between a first device and a second device. Applicants hereby seek clarification regarding why the Examiner has cited this portion of Freeman. Applicants assert that this portion of Freeman makes no teachings which are pertinent to the limitations recited in claim 32.

As to the other portion of Freeman which the Examiner asserts recites "a switching fabric emulator connected to remote units via a trunk group," it is again unclear to Applicants how this portion of Freeman includes any teaching of the limitations recited in claim 32. This portion of Freeman merely states that a switching fabric emulator connected with a remote call-through test unit via a trunk group includes network emulation software which simulates signaling and switching systems such as a switches. (Freeman, col. 4, lines 62-68) Applicants assert that Freeman fails to teach or suggest a trunking pseudo driver that allows a first interface and a second interface to emulate a single high-speed device by assigning to said first and second interfaces an associated identifier that identifies a connection between a first device and a second device as recited in claim 32. Applicants, therefore, assert that this portion of Freeman makes no teachings which are pertinent to the limitations recited in claim 32.

Therefore, as set forth in the above two paragraphs, Freeman fails to cure the deficiencies of Nair.

For all of the reasons set forth above, the combination of Nair and Freeman fails to teach or suggest all of the limitations recited in claim 32. As such, claim 32 and all claims depending thereon are patentable over the cited art.